

Gerald L. Warren, OSB #814146  
*gwarren@geraldwarrenlaw.com*  
901 Capitol St. NE  
Salem, OR 97301  
Telephone: (503) 480-7252  
Fax: (503) 779-2716  
Attorney for Defendant City of Grants Pass

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
MEDFORD DIVISION

DEBRA BLAKE, an individual, on behalf of  
herself and all others similarly situated,

Case No. 1:18-cv-01823-CL

Plaintiff,  
v.

**DEFENDANT'S UNOPPOSED  
MOTION FOR EXTENSION OF TIME  
TO FILE AN APPEARANCE**

CITY OF GRANTS PASS,

Defendant.

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**LR 7-1 CERTIFICATION**

Counsel for defendant has conferred with Mr. Ed Johnson, one of the attorneys for plaintiff, by email on October 25, 2015 and requested an extension until December 12, 2018 to file an appearance by way of Answer or Motion. Mr. Johnson advised that plaintiff does not object to an extension.

**MOTION**

Defendant moves the Court for a 30-day extension from the current due date of November 12, 2018 to December 12, 2018 for the defendant to file its Answer or Motion to plaintiff's Complaint. Counsel for the defendant will need the additional time to file an

appearance on behalf of defendant due to the need to obtain and review all records and to meet with my client representatives, and other scheduling and holiday conflicts.

This Motion is not made for any improper purpose or unreasonable delay but is based upon legitimate scheduling needs.

DATED this 29th day of October, 2018.

s/ Gerald L. Warren

Gerald L. Warren, OSB #814146  
Attorney for Defendant City of Grants Pass

### CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing DEFENDANT'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE AN APPEARANCE on:

Walter F. Fonseca  
Oregon Law Center  
P.O. Box 429  
Grants Pass, OR 97528

Edward Johnson  
Oregon Law Center  
522 SW 5th Ave., Ste. 812  
Portland, OR 97204  
Attorneys for Plaintiffs

by the following indicated method or methods:

- by **electronic means through the Court's Case Management/Electronic Case File system** on the date set forth below;
- by **emailing** a copy thereof to each attorney at each attorney's last-known email address on the date set forth below;
- by **mailing** a full, true, and correct copy thereof in a sealed, first-class postage-prepaid envelope, addressed to each attorney's last-known address listed above and depositing it in the U.S. mail at Salem, Oregon on the date set forth below.

DATED this 29th day of October, 2018.

s/ Gerald L. Warren  
Gerald L. Warren, OSB #814146  
Attorney for Defendant City of Grants Pass

CERTIFICATE OF SERVICE